

Andrew J. Frisch
Partner

212-344-5400
afrisch@schlamstone.com

SCHLAM STONE & DOLAN LLP

26 Broadway, New York, NY 10004
Main: 212 344-5400 Fax: 212 344-7677
schlamstone.com

June 10, 2021

The Honorable Rachel P. Kovner
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Robert Smith, 21-CR-254 (RPK)

Dear Judge Kovner:

On behalf of Robert Smith in the above-referenced case, I submit this letter as a request that the Court modify the terms of Mr. Smith's release to permit him to meet with me in my office in Manhattan, within the Southern District of New York. My understanding is that Mr. Smith's travel is currently limited to the Eastern District of New York where he resides. Pretrial Services Officer Amanda Sanchez has advised me that she has no objection to Mr. Smith's travel to Manhattan to meet with counsel, but that the conditions of Mr. Smith's release must first be modified to permit the travel. The government has also advised me that it has no objection to Mr. Smith's travel to the Southern District of New York for the purpose of meetings with counsel.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Andrew J. Frisch
Andrew J. Frisch

cc: AUSA Ryan C. Harris
AUSA Nicholas Moscow